

Attention: Rules Processing Team (RPT)

On behalf of Unocal's Gulf Region USA Business Unit, the attached comments regarding 1010-AC83, SCP, are being submitted for your review.

Section 250.527, paragraph (e), last sentence states "After the diagnostic test, you must replace the total volume of any removed liquids with a fluid of equal or greater density." This is a particularly onerous task given that the only safe methods of replacing liquids is to either pump in and bleed, or to lubricate fluids in through the casing valve. Both methods can be very time consuming. It is recognized that repeated bleeds may vacate a sizeable portion of annular fluids, resulting in reduced hydrostatic pressure, which in turn could result in excessive surface pressures. In these cases, fluids should be replaced. However, most fluids (particularly oil-based) undergo expansion as produced fluids heat up the wellbore. This recovered fluid cannot be added back, and even if some fraction could be, it wouldn't have a material effect on hydrostatic pressures. Recommended is the removal of this stipulation, leaving this issue to the discretion of the reviewing engineer.

Section 250.527, paragraph (d), is not very clear. Does it mean to bleed the casings to zero while shut-in or flowing, or does it matter?

Also, did the old diagnostic test to bleed the casing pressure by 20% while flowing go away? It does not appear anywhere in the proposed rule.

Thanks!  
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